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June 26, 2025

VIA ECF

The Honorable Victoria Reznik
United States Magistrate Judge
Federal Building and US Courthouse
300 Quarropas Street
White Plains, New York 10601-4150

Re: *The Wave Studio, LLC v. trivago N.V.*, 7:23-cv-03568-CS;
***The Wave Studio, LLC v. General Hotel Management Ltd.*, 7:13-cv-09239**

Dear Judge Reznik:

We write on behalf of Defendant trivago N.V. (“trivago”) in response to ECF 529. This confirms that Defendant trivago N.V. is represented by Roger Juan Maldonado and Jeffrey J. Catalano of the law firm of Smith, Gambrell & Russell, LLP, both of whom have appeared in Case No. 7:23-cv-03586 (see ECF 20, 35).

trivago responds to the issues set forth in Plaintiff’s June 18, 2025 letter (dkt. 528) as follows: (i) trivago takes no position on the role of the operative complaint vis-à-vis the complaints in the individual actions; (ii) trivago takes no position on whether certain Defendants “leverage procedural ambiguity to evade participation,” as this section does not appear to pertain to trivago; (iii) trivago has appeared and is represented by Smith, Gambrell & Russell, LLP, as confirmed above; (iv) as trivago informed Wave previously, trivago remains open to discussing settlement, whether as a part of a global resolution or on an individual basis. Wave has yet to make any settlement demand of trivago; and (v) trivago submits that any status conference is premature, given the pending motions to dismiss.

Finally, please note that Trivago Services US, LLC initially a defendant in the 7:23-cv-03586 action, was voluntarily dismissed without prejudice pursuant to Fed. R. Civ. P. 41(a)(1)(A)(i). *See* ECF 68. Regardless of how the dispute is resolved with respect to whether the Master Complaint or complaints in the individual actions are the operative complaint, Trivago Services US, LLC has been dismissed from this action and is no longer before the Court.

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Respectfully,



Roger Juan Maldonado

cc: Counsel of Record